

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE,

Defendant.

Case No. 1:18-cr-00204-NGG-VMS

**NOTICE OF MOTION FOR JUDICIAL  
DISQUALIFICATION**

**ORAL ARGUMENT REQUESTED**

Submitted on May 5, 2022

PLEASE TAKE NOTICE that Mr. Keith Raniere, by and through his undersigned counsel, Joseph M. Tully, will move pursuant to 28 U.S.C. § 445 that Judge Nicolas G. Garaufis, United States District Judge for the Eastern District of New York, disqualify himself from any further proceedings in this case (1) because his impartiality may reasonably be questioned and (2) because Mr. Raniere's Fifth and Fourteenth Amendment rights to a fair trial before an unbiased, impartial tribunal have not been waived.

Dated: May 5, 2022  
Martinez, CA

Respectfully submitted,

/s/Joseph M. Tully  
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